

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 18-26 (PJS/SER)**

UNITED STATES OF AMERICA,)
)
Plaintiff,) **MOTION TO SUPPRESS
 EVIDENCE OBTAINED AS
 A RESULT OF SEARCHES
 AND SEIZURES**
v.)
)
TNUZA JAMAL HASSAN,)
)
Defendant.)

The Defendant, Tnuza Hassan, by and through her attorneys, hereby moves the Court, pursuant to Rule 12, Federal Rules of Criminal Procedure, for an order suppressing evidence purportedly justified by authority of search warrants to Google for all Google email accounts belonging to defendant, and a search warrant to open a cell phone purportedly belonging to defendant on the following grounds:

1. If the evidence was seized pursuant to search warrants, the warrants were not supported by probable cause, were overly broad, and failed to specify the evidence to be seized with sufficient specificity as required under the Fourth Amendment to the U.S. Constitution.
2. If the evidence was seized pursuant to search warrants, the government seized and reviewed evidence that was outside of the authority granted the government by the search warrants.

In discussions with the government, the government has not yet received a return on the search warrants issued. Defendant requests that this Motion be reserved, until there is a return on the search warrants so that defendant can review the evidence seized and the search warrants to determine if she will contest the evidence.

This Motion is based upon the Indictment, the records and proceedings in this matter, and any and all other material that may be presented to the Court prior to or at the time of hearing of this motion.

Dated: April 5, 2018

Respectfully submitted,

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